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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA, ) NO. CR 21-00181-VC  
17 Plaintiff, )  
18 v. ) STIPULATION TO CONTINUE STATUS AND  
19 MIN JIN ZHAO, ) EXCLUDE TIME TO APRIL 28, 2022, AND  
20 Defendant. ) [PROPOSED] ORDER AS MODIFIED

21 The parties are currently set for a status in this case on March 31, 2022. The parties have  
22 conferred, and stipulate to continue the March 31 status date to April 28, 2022, so to permit defense  
23 counsel additional time to review discovery and to confer with the defendant, who is in custody, to  
24 consider the government's plea offer.

25 In addition, the parties stipulate that time be excluded under the Speedy Trial Act through April  
26 28, 2022, so that defense counsel can continue to prepare, including by reviewing the discovery already  
27 produced and consider the government's plea offer. For these reasons, the parties stipulate and agree  
28 that excluding time until April 28, 2022 will allow for the effective preparation of counsel. *See* 18  
U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by  
excluding the time through April 28, 2022 from computation under the Speedy Trial Act outweigh the

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER

Case No. CR 21-00181-VC

v. 7/10/2018

1 best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

2 The undersigned Assistant United States Attorney certifies that he has obtained approval from  
3 counsel for the defendant to file this stipulation and proposed order.

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5 IT IS SO STIPULATED.

6 DATED: 3/29/22

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8 /s/  
9 ANKUR SHINGAL  
10 Assistant United States Attorney

11 DATED: 3/29/22

12 /s/  
13 ELIZABETH FALK  
14 Counsel for Defendant ZHAO

15 **[PROPOSED] ORDER AS MODIFIED**

16 Based upon the facts set forth in the stipulation of the parties, the status conference is continued  
17 to April 28, 2022. The Court further finds that failing to exclude the time through April 28, 2022 would  
18 unreasonably deny defense counsel and the defendant the reasonable time necessary for effective  
19 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The  
20 Court further finds that the ends of justice served by excluding the time from through April 28, 2022  
from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant  
in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the  
time through April 28, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.  
§ 3161(h)(7)(A), (B)(iv). \*\*\*No further extensions will be granted.

21 IT IS SO ORDERED.

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23 DATED: March 31, 2022

